

Exhibit A

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February 3, 2023

VIA EMAIL

Michael L. Rodenbaugh, Esq.
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Attorneys for "George Dikian"

Re: VPN.COM LLC v. GEORGE DIKIAN, et al.

2:22-cv-04453-AB-MAR

Dear Mike R.:

While we have had our ongoing discussion/dispute as to your client's refusal to provide their true identity in connection with this action, in light of your client's recent Rule 26 Initial Disclosures, which also failed to list your client's true identity, we must now make a formal demand that your client amend their Rule 26 disclosures and disclose their identity immediately. As we have explained to you previously, if your client wishes to proceed in this action anonymously, you will have to file a formal motion for that relief. As also explained, even if you were successful on that motion, that would only allow your client to proceed anonymously on the public docket, not anonymously as to the Plaintiff. We will need to seek discovery from your client, we will need to depose your client, we will need to seek third-party discovery as to your client. These all require the Plaintiff to know your client's identity.

LEWIS & LIN LLC

Please let this letter serve as an LR 37-1 request for a meet and confer within the next 10 days in order to discuss this dispute. If the dispute cannot be resolved, we intend to file a motion to compel seeking an Order directing your client disclose their true identity, name and address. Please let me know a good time for you to discuss by phone.

Respectfully,

A handwritten signature in black ink, appearing to read 'M. Cilento', with a long horizontal stroke extending to the right.

Michael D. Cilento, Esq.